

Michael Kind (NV Bar No. 13903)

Mk@kindlaw.com

KIND LAW FIRM

8860 S. Maryland Pkwy, Suite 106

Las Vegas, NV 89123

Tel: (702) 337-2322

Fax: (702) 329-5881

Gayle M. Blatt (*pro hac vice*)

gmb@cglaw.com

CASEY GERRY SCHENK

FRANCAVILLA BLATT & PENFIELD, LLP

110 Laurel Street

San Diego, CA 92101

Tel: (619) 238-1811

Fax: (619) 544-9232

Attorneys for Plaintiff and the Putative Class

[Additional Counsel Listed on Signature Page]

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RONALD STALLONE, on behalf of
himself and all other persons similarly
situated,

Plaintiff,

v.

FARMERS GROUP, INC., a Nevada
Corporation; FARMERS INSURANCE
EXCHANGE; and 21st CENTURY
INSURANCE COMPANY,

Defendants.

Case No. 2:21-cv-01659-GMN-VCF

**STIPULATION AND [PROPOSED]
ORDER FOR DISMISSAL WITH
PREJUDICE**

1 Plaintiff Ronald Stallone (“Plaintiff”) and Defendants Farmers Group, Inc., Farmers
 2 Insurance Exchange, and 21st Century Insurance Company (“Defendants”) (collectively,
 3 the “Parties”) by and through their counsel of record stipulate as follows:

4 1. Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, the
 5 Parties jointly stipulate that Plaintiff’s individual claims in this action are hereby
 6 **DISMISSED WITH PREJUDICE** and the putative class claims are **DISMISSED**
 7 **WITHOUT PREJUDICE**.

8 2. Except as the parties may otherwise have agreed, each party will bear his,
 9 her, or its own costs and expenses, including attorneys’ fees.

10 Respectfully submitted this 2nd day of August, 2024.

11
 12 By: /s/ Kate M. Baxter-Kauf

13 Michael Kind, SBN 13903
 14 E-mail: mk@kindlaw.com
 15 **KIND LAW**
 16 8860 S. Maryland Parkway, Suite 106
 17 Las Vegas, Nevada 89123
 18 Tel: 702.337.2322

19 Gayle M. Blatt (CA 122048)
 20 (*pro hac vice admitted*)
 21 E-mail: gmb@cglaw.com
 22 **CASEY GERRY SCHENK**
 23 **FRANCAVILLA BLATT &**
 24 **PENFIELD, LLP**
 25 110 Laurel Street
 26 San Diego, CA 92101
 Tel: (619) 238-1811
 Fax: (619) 544-9232

Kate M. Baxter-Kauf* (MN
 #0392037)
 (*pro hac vice admitted*)
 E-mail: kmbaxter-kauf@locklaw.com
 Karen Hanson Riebel (MN #0219770)
 (*pro hac vice admitted*)

s/ Jennifer K. Hostetler

Jennifer K. Hostetler, SBN 11994
 E-mail: jhostetler@lewisroca.com
LEWIS ROCA
 3993 Howard Hughes Parkway, Suite 600
 Las Vegas, Nevada 89169-5996
 Tel: 702.474.2624

Isabelle Ord, Cal. Bar No. 198224
 (*pro hac vice admitted*)
 E-mail: isabelle.ord@us.dlapiper.com
 Andrew Serwin, Cal. Bar No. 179493
 (*pro hac vice admitted*)
 E-mail: andrew.serwin@us.dlapiper.com
 Jeffrey DeGroot, WSBA No. 46839
 (*pro hac vice admitted*)
 E-mail: jeffrey.degroot@us.dlapiper.com
DLA PIPER LLP (US)

555 Mission Street
 San Francisco, California 94105-2933
 Tel: 415.836.2500
 Fax: 415.836.5201

Attorneys for Defendants FARMERS

1 E-mail: khriebel@locklaw.com
2 Maureen Kane Berg (MN #033344X)
3 (*pro hac vice* admitted)

E-mail: mkberg@locklaw.com

**LOCKRIDGE GRINDAL NAUEN
P.L.L.P.**

100 Washington Avenue South
Suite 2200

Minneapolis, MN 55401

Tel: (612) 339-6900

Fax: (612) 339-0981

Attorneys for Plaintiff Stallone

GROUP, INC., FARMERS INSURANCE
EXCHANGE, AND 21st CENTURY
INSURANCE COMPANY

ORDER

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE

DATED: _____